## STATE OF MAINE DEPARTMENT OF ENVIRONMENTAL PROTECTION



PAUL R. LEPAGE GOVERNOR PATRICIA W. AHO
ACTING COMMISSIONER

Lincoln Paper & Tissue, LLC Penobscot County Lincoln, Maine A-177-77-5-M

# Departmental Findings of Fact and Order New Source Review

After review of the air emissions license application, staff investigation reports and other documents in the applicant's file in the Bureau of Air Quality, pursuant to 38 M.R.S.A., § 344 and § 590, the Department finds the following facts:

### I. REGISTRATION

### A. Introduction

FACILITY	Lincoln Paper and Tissue, LLC (LPT)
INITIAL LICENSE NUMBER	A-177-70-A-I
LICENSE TYPE	06-096 CMR 115, Minor Revision
NAICS CODES	322121
NATURE OF BUSINESS	Pulp and Paper Mill
FACILITY LOCATION	Lincoln, Maine
DETERMINATION ISSUANCE DATE	July 14, 2011

### B. Revision Description

The purpose of this minor revision is to license the conversion of burners on the #7 Tissue Machine (TM7) and the #8 Tissue Machine (TM8) from the existing #2 fuel oil/biofuel burners to multi-fuel burners. The multi-fuel burners will be capable of firing natural gas, propane, biofuel, and #2 fuel oil. LPT also plans to utilize waste heat from the hot air system economizer for preheating combustion air on TM8.

### C. Application Classification

The application for LPT does not violate any applicable federal or state requirements and does not reduce monitoring, reporting, testing or record keeping. This application does address Best Available Control Technology (BACT).

The Department does not expect the requested change to result in any increase of any regulated pollutant. Therefore, this amendment is determined to be a minor revision under Major and Minor Source Air Emission License Regulations, 06-096 CMR 115 (as amended) and has been processed as such.

### II. BEST PRACTICAL TREATMENT (BPT)

### A. <u>Introduction</u>

In order to receive a license the applicant must control emissions from each unit to a level considered by the Department to represent Best Practical Treatment (BPT), as defined in 06-096 CMR 100 (as amended). Separate control requirement categories exist for new and existing equipment as well as for those sources located in designated non-attainment areas.

BPT for new sources and modifications requires a demonstration that emissions are receiving Best Available Control Technology (BACT), as defined in 06-096 CMR 100 (as amended). BACT is a top-down approach to selecting air emission controls considering economic, environmental and energy impacts.

### B. #7 and #8 Tissue Machines multi-fuel fired burners

LPT has requested a minor revision to license the conversion of the burners on the #7 Tissue Machine (TM7) and the #8 Tissue Machine (TM8). The new burners will have the same heat input capacity as the existing burners which is 15 MMbtu/hr for TM7 and 2 burners at 12.5 MMbtu/hr each for TM8. With this implementation, LPT will be converting to natural gas as the primary fuel for the tissue machines. The ability to burn propane or oil is being retained in the design in the event there are logistical or supply problems with receiving natural gas.

On TM8, in addition to the burner conversion, LPT plans to modify the combustion air system to utilize waste heat from the hot air system economizer to preheat the combustion air. The projected benefit is a 10 percent reduction in the overall fuel used on the machine. This reduction in fuel use saves energy and lowers emissions.

The new burners will be capable of operating on any of the licensed fuels to be able to meet the existing air emission license limits. With the combustion efficiency improvements on TM8, and the conversion of both machines to natural gas, this project will result in reductions in overall emissions of particulate, SO<sub>2</sub>, NOx, CO and CO<sub>2</sub>. Therefore, BACT for TM7 and TM8 is the installation of the new burners capable of firing natural gas, propane, biofuel, or #2 oil and is determined to be good combustion practices. The new burners are anticipated to be installed in September 2011.

2

Lincoln Paper and Tissue, LLC Penobscot County Lincoln, Maine A-177-77-5-M Departmental
Findings of Fact and Order
New Source Review

### **ORDER**

3

Based on the above Findings and subject to conditions listed below, the Department concludes that the emissions from this source:

- will receive Best Practical Treatment,

- will not violate applicable emission standards,

- will not violate applicable ambient air quality standards in conjunction with emissions from other sources.

The Department hereby grants Air Emission License A-177-77-5-M pursuant to the preconstruction licensing requirements of 06-096 CMR 115 (as amended) and subject to the standard and special conditions below.

<u>Severability</u>. The invalidity or unenforceability of any provision, or part thereof, of this License shall not affect the remainder of the provision or any other provisions. This License shall be construed and enforced in all respects as if such invalid or unenforceable provision or part thereof had been omitted.

### The following are New Conditions:

(1) The Department approves of the firing of multi-fuels, including natural gas, propane, biofuels, and #2 oil, combusted in the burners on #7 and #8 tissue machine dryers.

DONE AND DATED IN AUGUSTA, MAINE THIS 14th DAY OF July 2011.

DEPARTMENT OF ENVIRONMENTAL PROTECTION

BY: Me Canus System
PATRICIA W. AHO, ACTING COMMISSIONER

PLEASE NOTE ATTACHED SHEET FOR GUIDANCE ON APPEAL PROCEDURES

Date of initial receipt of application: June 17, 2011

Date of application acceptance: June 21, 2011

Date filed with the Board of Environmental Protection:

This Order prepared by Edwin Cousins, Bureau of Air Quality

